



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

JUN 27 2019

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7014 1200 0000 6122 9096

Mr. Matt Thelen
WDC Acquisition LLC
1746 Commerce Road
Creston, Iowa 50801

RCRA



RE: Approval of Interim RFI Report for
Wellman Dynamics Corporation, Creston, Iowa
Administrative Order on Consent Docket No. RCRA-07-2003-0167
EPA ID No. IAD065218737

Dear Mr. Thelen:

The U.S. Environmental Protection Agency Region 7 has completed a review of the Interim RCRA Facility Investigation Report, submitted by Penn Environmental & Remediation, Inc., on behalf of WDC Acquisition, LLC on April 12, 2019. The purpose of the interim report is to present the data gathered during the completion of the additional RFI work as described in the EPA-approved Sampling and Analysis Plan/Quality Assurance Project Plan, and associated Addenda and Revisions.

In accordance with the referenced Administrative Order on Consent, Section IX Agency Approvals/Proposed Contractor/Additional Work, the EPA hereby approves WDC's April 12, 2019, Interim RFI Report and this report is incorporated into the referenced Order.

The EPA has determined that based on the work and the data collected, no additional RCRA facility investigation activities are needed at this time except for the continued collection and analysis of groundwater samples from the off-site, downgradient monitoring wells (MW-44, MW-45, MW-46, MW-47, MW-48 and MW-49). As stated in the Interim RFI Report, page 18, No. 7, "Offsite, downgradient monitoring wells will continue to be monitored semiannually as a requirement of the IDNR Sanitary Disposal Project Permit No. 88-SDP-04-86P." The EPA agrees that the data generated from the ongoing IDNR monitoring program can and will be utilized during the future RCRA Corrective Action.

As documented in WDC's June 25, 2019, email to the EPA, WDC also agrees to conduct annual groundwater sampling of the following on-site monitoring wells: MW-A, MW-11, MW-20, MW-30, MW-35, MW-37, MW-38R, MW-39, MW-41, MW-42 (background) and MW-43 (background).

Groundwater samples collected from the above referenced wells will be analyzed for the constituents listed in Table 16, attached, except for MW-11, MW-20, MW-30, MW-37, MW-39, MW-41, MW-42,

MW-43, MW-44, MW-45, MW-46, MW-47, MW-48 and MW-49, analysis of Nitrate-N, Nitrite-N and Hex Chromium is not required by the EPA.

The EPA believes it is in the best interest of human health and the environment that groundwater samples from the referenced on-site and off-site downgradient wells continue to be collected and analyzed, and the results also reported to the EPA. Sampling results, including copies of laboratory/monitoring data, shall be reported to the EPA in quarterly progress reports. The EPA does not consider this annual groundwater sampling to be an additional RFI activity. Also, as discussed by the EPA with WDC during the June 6, 2019, meeting, any additional soil sampling to further define the extent of contamination will be conducted as part of remedy implementation, as applicable.

The EPA also agrees with the WDC's recommendation made in the interim report to continue with the preparation of the RFI report. Therefore, in accordance with Attachment 2 of the referenced Administrative Order on Consent, the RFI Report (Task IV) is due to the EPA on or before 90 days from the date of this letter. Any request for a compliance date modification (for example, an extension of the RFI Report due date) must be made in writing to the EPA and in accordance with Section XXII, Modification, of the referenced Order.

If you have any questions pertaining to this matter, please contact me at (913) 551-7627 or by email at murrow.patricia@epa.gov.

Sincerely,



Patricia Murrow
Project Manager
RCRA Direct Implementation Section
Land, Chemical & Redevelopment Division

Enclosure

cc: Richard F. Vannucci, Penn E&R, Environmental & Remediation, Inc.(w/encl)
Mick Leat, IDNR (w/encl)
Randal S. Dahlin, IDPH (w/encl)
Amie Davidson, IDNR (w/encl)

Table 16
Proposed Groundwater Sampling Scope Summary
Wellman Dynamics Corporation / Quality Assurance Project Plan

| | | Organics | | Inorganics | | | | | | | | | | | | | |
|--------------------|-------|----------|-------------|-----------------|------------------|---------|-----------|-------|---------|----------------------|------|------|----------|-----------|-----------|----------|---------|
| | Well | VOCs | 1,4 Dioxane | Chromium (hex.) | Chromium (total) | Arsenic | Beryllium | Boron | Cadmium | Fluoride (distilled) | Iron | Lead | Vanadium | Nitrate-N | Nitrite-N | Chloride | Sulfate |
| Chrome Area Wells | MW1 | X | X | | | X | | X | | X | X | | | | | X | X |
| | MW2 | X | X | X | X | X | X | X | X | X | X | X | | | | X | X |
| | MW3 | X | X | X | X | X | X | X | X | X | X | | | | | X | X |
| | MWA | X | X | X | X | X | | X | X | X | X | X | | X | X | X | X |
| Landfill Wells | MW6 | X | | | | X | | X | | X | X | | | | X | X | X |
| | MW7 | | | X | X | X | X | X | X | X | X | X | X | | X | X | X |
| | MW8 | X | | | | | | X | | X | X | | | X | X | X | X |
| | MW9 | | | | | | | X | | X | X | | | | | X | X |
| | MW10 | | | | | X | | X | X | X | X | | | | X | X | X |
| | MW11 | X | X | | | X | | X | X | X | X | | | | X | X | X |
| | MW12 | X | X | | | X | | X | | X | X | | | | X | X | X |
| | MW13 | X | X | | | X | X | X | | X | X | X | X | | | X | X |
| | MW14 | X | X | | | | | X | X | X | X | | | | X | X | X |
| | MW15 | X | | | | X | | X | X | X | X | | | | X | X | X |
| Rad Wells | MW16 | X | X | | | X | | X | | X | X | | | | | X | X |
| | MW17 | X | X | | | | X | X | | X | X | | | | | X | X |
| Dross | MW18 | | | | | | | X | | X | X | | | | X | X | X |
| | MW19 | X | X | | | X | | X | | X | X | | | X | X | X | X |
| New Landfill Wells | MW20 | X | X | | | X | | X | | X | X | | | | | X | X |
| | MW27 | X | X | | | | | X | X | X | X | | | X | X | X | X |
| | MW28 | X | X | | | X | | X | X | X | X | | | | | X | X |
| | MW29 | X | X | X | X | X | X | X | X | X | X | X | X | | X | X | X |
| | MW30 | X | X | X | X | X | | X | | X | X | | | | X | X | X |
| | MW31 | | | X | X | X | | X | | X | X | | | | | X | X |
| | MW32 | X | | | | | | X | | X | X | | | | X | X | X |
| VOC Wells | MW33 | X | | | | | | X | | X | X | | | | | X | X |
| | MW34 | X | X | | | X | | X | X | X | X | | | | | X | X |
| | MW35 | X | X | X | X | X | X | X | X | X | X | | | | | X | X |
| | MW36R | X | X | X | X | X | X | X | X | X | X | | | | | X | X |
| | MW37 | X | X | | | | | X | | X | X | | | | | X | X |
| | MW38R | X | X | X | X | X | | X | | X | X | | | X | X | X | X |
| | MW39 | X | X | | | | | X | | X | X | | | | X | X | X |
| | MW40 | X | | | | | | X | | X | X | | | | | X | X |
| Upgradient | MW41 | X | X | | | X | | X | | X | X | | | | | X | X |
| | MW42* | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |
| | MW43* | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X | X |

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| | | Organics | | Inorganics | | | | | | | | | | | | | |
|--------------------------------|-------|----------|-------------|-----------------|------------------|---------|-----------|-------|---------|----------------------|------|------|----------|-----------|-----------|----------|---------|
| | Well | VOCs | 1,4 Dioxane | Chromium (hex.) | Chromium (total) | Arsenic | Beryllium | Boron | Cadmium | Fluoride (distilled) | Iron | Lead | Vanadium | Nitrate-N | Nitrite-N | Chloride | Sulfate |
| Off Site Downgradient Wells | MW44* | X | X | X | X | X | X | X | X | X | X | X | X | | X | X | X |
| | MW45* | X | X | X | X | X | X | X | X | X | X | X | X | | X | X | X |
| | MW46* | X | X | X | X | X | X | X | X | X | X | X | X | | X | X | X |
| | MW47* | X | X | X | X | X | X | X | X | X | X | X | X | | X | X | X |
| | MW48* | X | X | X | X | X | X | X | X | X | X | X | X | | X | X | X |
| | MW49* | X | X | X | X | X | X | X | X | X | X | X | X | | X | X | X |

TABLE LEGEND

X = Proposed for additional sampling
 *Proposed well

SAMPLING PROGRAM APPROACH

| | |
|---|-------------------------------------------------------------------------------------------------------------------------------|
| | = No sampling proposed, not previously detected above RBSL or not sampled for this parameter |
| X | = Previously detected above RBSL, resampling proposed |
| X | = Previously detected below RBSL but proposed for sampling based on results at other wells (potential contaminant of concern) |
| X | = new well |
| X | = Not previously detected but strategic to sample based on other results |
| X | = Not previously sampled but strategic to sample based on other results |

I:\2631\Reports\RFI Workplan Addendum\Tables\Table16_proposed_scope.xls\Round 3